

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

PLUMBERS' PENSION FUND, LOCAL 130 U.A.,)	
PLUMBERS' WELFARE FUND, LOCAL 130,)	
U.A., THE TRUST FUND FOR APPRENTICE)	
AND JOURNEYMAN EDUCATION AND)	Case No.: 1:14 CV 09933
TRAINING, LOCAL 130, U.A., PLUMBERS)	
RETIREMENT SAVINGS PLAN FUND, LOCAL)	Judge Manish S. Shah
130, U.A., and CHICAGO JOURNEYMEN)	
PLUMBERS LOCAL UNION 130, U.A., GROUP)	
LEGAL SERVICES PLAN FUND)	
)	
Plaintiff,)	
)	
v.)	
)	
PELLEGRINI PLUMBING, LLC and DANIEL)	
PELLEGINI, individually,)	
)	
Defendants.)	

MOTION FOR ORDER OF CONFESSION OF JUDGMENT

NOW COMES the Defendant, PELLEGRINI PLUMBING, LLC, (hereinafter "PELLEGRINI"), by and through its attorneys, Chitkowski Law Offices, and for its Motion for Order of Confession of Judgment on Count I of PLUMBERS' PENSION FUND, LOCAL 130, U.A., et al. (collectively referred to as the "Local 130 Trust Funds") Complaint against the Defendant, states as follows:

1. On December 11, 2014, PLUMBERS' PENSION FUND, LOCAL 130, U.A., et al. (collectively referred to as the "Local 130 Trust Funds") filed its Complaint (hereinafter referred to as the "Complaint") under case number 1:14 CV 09933. *See* Complaint, marked as Exhibit A., attached hereto and made a part hereof.

2. The Local 130 Trust Funds receives contributions from numerous employers pursuant to Collective Bargaining Agreements between the employers and the CHICAGO JOURNEYMEN PLUMBERS' LOCAL UNION 130, U.A., ("Local Union 130").

2. On October 8, 2009, Plaintiffs allege that the Defendant, Pellegrini Plumbing, LLC entered into a Collective Bargaining Agreement whose terms required the Defendant to pay fringe benefits to the Local 130 Trust Funds. *See* Complaint, Ex. A.

3. Based upon the audit conducted pursuant to the Collective Bargaining Agreement, Pellegrini would confess judgment in the principal amount of Six Hundred One Thousand, Nine Hundred Sixty and 54/100 Dollars (\$601,960.54). As of the date of filing, based on the 8% liquidated damages provision, and interest rate, Pellegrini would confess to judgment to Forty-Eight Thousand One Hundred Fifty-Six and 84/100 Dollars (\$48,156.84) in liquidated damages, and Sixty-Seven Thousand, Eight Hundred Fifty and 00/100 Dollars (\$67,850.00) in interest. Pellegrini would also confess judgment to reasonable attorney fees.

4. As set forth above, Pellegrini agrees to a confession of judgment being entered against it, for all outstanding debts owed to Local 130 Trust Funds, including all accrued interest, court costs and reasonable attorneys' fees.

5. An Order of Confession of Judgment against Pellegrini on Count I of the Complaint is proper. *See* Proposed Judgment Order, marked as Exhibit B, attached hereto and made a part hereof.

WHEREFORE, the Defendant, PELLEGRINI PLUMBING, LLC., respectfully prays that this Honorable Court enter an Order of Judgment on Count I of the Complaint, in the principal amount of Six Hundred One Thousand, Nine Hundred Sixty and 54/100 Dollars (\$601,960.54), liquidated damages in the amount of Forty-Eight Thousand One Hundred Fifty-

Six and 84/100 Dollars (\$48,156.84), interest in the amount of Sixty-Seven Thousand, Eight Hundred Fifty and 00/100 Dollars (\$67,850.00), and reasonable attorney fees, along with any further relief this Court deems just and equitable.

Respectfully submitted,
CHITKOWSKI LAW OFFICES

By:



One of its Attorneys

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